

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA

Plaintiff,

vs.

NICOLE GEORGES,

Defendant.

Case No. 2:20-cr-157

Chief Judge Algenon L. Marbley

UNITED STATES' AMENDED EXHIBIT LIST

Gov. Exhibit #	Bates #	Description
100 SERIES – INSYS DOCUMENTATION		
101		Georges Insys Employment Application
102		Georges Insys SSP Employment Offer June 2014
103		Georges Insys District Sales Trainer Employment Offer December 2015
104		Georges Insys District Sales Manager Employment Offer September 2016
105		June 2014 Georges Training Documents
106		Insys Compensation Policy
107		1501_INS 2385674 Payout Based on Paid Script Chart
108		Georges Letter of Warning January 2018
109		Jimmy Henry Speaker Program Contract October 2014
110		Jimmy Henry Speaker Program Contract October 2015
111		Jimmy Henry Speaker Program Contract August 2016
112		Subsys Cell Decks
113		1/06/15 Insys Speaker Program Documentation (Shrewsbury)
114		1/21/15 Insys Speaker Program Documentation (Kaplansky)
115		1/29/15 Insys Speaker Program Documentation (multiple / Shrewsbury)
116		2/26/15 Insys Speaker Program Documentation (Shrewsbury)
117		4/02/15 Insys Speaker Program Documentation (MCMT–St. Anne’s / Dine)

118		5/01/15 Insys Speaker Program Documentation (Ohio Health Primary Care / Sage)
119		5/15/15 Insys Speaker Program Documentation (Buckeye / Kuriakose)
120		5/15/15 Insys Speaker Program Documentation (Pond)
121		5/27/15 Insys Speaker Program Documentation (Family Physicians of Gahanna)
122		5/29/15 Insys Speaker Program Documentation (Konold)
123		6/19/15 Insys Speaker Program Documentation (COPC / Gramann)
124		8/13/15 Insys Speaker Program Documentation (Family Physicians of Gahanna / Stathulius)
125		9/11/15 Insys Speaker Program Documentation (Arlington Mill / Ecker)
126		6/29/16 Insys Speaker Program Documentation (Regenerative Spine)
127		8/06/16 Insys Speaker Program Training in DC Documentation – Sign In Sheets & Training Agenda
128		0661_INS0000542 Insys Training Module – Compliance
129		0112_INS BOS 00289672 Subsys Monthly Top Writer Tracker Feb 2015
130		2007-01_INS BOS 00325841 Subsys Sales by Week Chart Q3 '15
131		Couch Insys Documentation – Insys Module 4 Intro to Opioids
132		INS-OH-00081207 Georges Email 11/21/2014
133		INS-OH-00081208 Georges Email 11/19/2014
134		Georges Email 11/05/14 with Attachment
135		0175_INS 1613026 Email re: ISP's, Sales Reps, Sales Initiatives
136		0199_INS 2341947 Email with Speaker Bureau Assessment Attachments
137		Couch Insys Documentation – Chat / Text Messages
138		Couch Insys Documentation – Email Communications & Speaker Event
139		Couch Insys & Subsys Documentation
140		Marinelli - Insys Documentation - Business Relationship Manager
141		Marinelli - Insys Documentation - Incentive Compensation Policy
142		Marinelli - Corporate Training Entry Quiz
200 SERIES – PATIENT DOCUMENTATION		
201		Patient Charts Obtained from eClinicalWorks (ECW)
202		ECW Patient Chart – M.C. - Encounters & Pt. Docs
203		Paper Patient Chart – M.C.
204		TIRF REMS Documentation – M.C.
205		ECW Patient Chart – M.M. - Encounters & Pt. Docs
206		TIRF REMS Documentation – M.M.
207		ECW Patient Chart – A.L. - Encounters & Pt. Docs
208		Paper Patient Chart – A.L.

209		TIRF REMS Documentation – A.L.
210		ECW Patient Chart – P.K. - Encounters & Pt. Docs
211		Paper Patient Chart – P.K.
212		TIRF REMS Documentation – P.K.
213		ECW Patient Chart – S.W. - Encounters & Pt. Docs
214		TIRF REMS Documentation – S.W.
215		ECW Patient Chart – T.Y. - Encounters & Pt. Docs
216		TIRF REMS Documentation – T.Y.
217		ECW Patient Chart – L.B. – Encounters & Pt. Docs.
218		TIRF REMS Documentation – L.B.
219		ECW Patient Chart – M.G. – Encounters & Pt. Docs.
220		TIRF REMS Documentation – M.G.
221		ECW Patient Chart – C.B. – Encounters & Pt. Docs.
222		Paper Patient Chart – C.B.
223		TIRF REMS Documentation – C.B.
224		ECW Patient Chart – D.M. – Encounters & Pt. Docs.
225		Paper Patient Chart – D.M.
226		TIRF REMS Documentation – D.M.
227		ECW Patient Chart – S.D. – Encounters & Pt. Docs.
227		Paper Patient Chart – S.D.
228		TIRF REMS Documentation – S.D.
229		ECW Patient Chart – M.P. – Encounters & Pt. Docs.
230		TIRF REMS Documentation – M.P.
231		ECW Patient Chart – C.M. – Encounters & Pt. Docs.
232		TIRF REMS Documentation – C.M.
233		TIRF REMS Documentation – All Midwest Patients
234		Expert Report – Dr. John W. Hill, M.D.
235		Federal Rule of Evidence 902(11) Business Records Affidavit – TIRF REMS Documentation
300 SERIES – PRESCRIPTION INFORMATION		
301		Jimmy Henry OARRS
302		State of Ohio Board of Pharmacy Review – Jimmy Henry OARRS
303		Felicia Ciamacco OARRS
304		State of Ohio Board of Pharmacy Review – Subsys Prescribing from Midwest
305		All Prescriptions – M.C.
306		M.C. Subsys Prescription 12/15/2014 (200 mcg)
307		M.C. Subsys Prescription 12/15/2014 (800 mcg)

308		M.C. Subsys Prescription 10/17/2016
309		M.C. Subsys Prescription 1/9/2017
310		M.C. Subsys Prescription 3/20/2017
311		All Prescriptions – M.M.
312		M.M. Subsys Prescription 10/15/2015
313		M.M. Subsys Prescription 11/16/2015
314		M.M. Subsys Prescription 2/2/2016
315		M.M. Subsys Prescription 4/19/2016
316		All Prescriptions – A.L.
317		A.L. Subsys Prescription 2/24/2015
318		A.L. Subsys Prescription 3/10/2015
319		A.L. Subsys Prescription 7/25/2016
320		A.L. Subsys Prescription 4/6/2017
321		All Prescriptions – C.B.
322		C.B. Subsys Prescription 10/13/2015
323		All Prescriptions – M.G.
324		Federal Rule of Evidence 902(11) Business Records Affidavit – Linden Care Pharmacy Prescriptions
400 SERIES – HEALTH CARE BENEFIT PROGRAM DOCUMENTATION		
401		Medicare – Part D Data
402		Medicare – Impact Calculations – Part D (0714)
403		Medicare – Impact Calculations – Part D (0827)
404		Summary Chart – Impact Calculations – Part D
405		Ohio Medicaid – Prescription Drug Claim Data
500 SERIES – REGULATIONS & EDUCATION		
501		FDA Approval – Subsys January 2012
502		Subsys Black Box Warning
503		Subsys Promotional Folder
504		Code of Federal Regulations - CSA
505		Medicare Reimbursement Formulary - Subsys
506		Medicare Prescription Drug Benefit Manual
507		Ohio Medicaid Reimbursement Formulary - Subsys
508		Ohio Medicaid Prescription Drug Reimbursement Documentation
600 SERIES – FINANCIAL DOCUMENTATION		
601		Jimmy Henry PNC Bank Documentation
602		Summary Chart – Jimmy Henry PNC Bank Payments from Plan365

603		Plan365 TowneBank Bank Documentation
604		Plan365 First Citizen's Bank Documentation
605		
606		
607		Plan365 Check # 28571 (1/7/2015 – Hudson 29 1/6/2015)
608		Plan365 Check # 28929 (1/26/2015 – Kaplansky 1/21/2015)
609		Plan365 Check # 29050 (2/2/2015 – Lindey's 1/29/2015)
610		Plan365 Check # 29592 (3/2/2015 – J. Alexander's 2/26/2015)
611		Plan365 Check # 30206 (4/6/2015 – MCMT 4/2/2015)
612		Plan365 Check # 31004 (5/5/2015 – Darby Creek 5/1/2015)
613		Plan365 Check # 31387 (5/21/2015 – Buckeye 5/15/2015)
614		Plan365 Check # 31366 (5/19/2015 – Pond 5/15/2015)
615		Plan365 Check # 31706 (6/2/2015 – Family Physicians 5/27/2015)
616		Plan365 Check # 31713 (6/2/2015 – Dr. Konold 5/29/2015)
617		Plan365 Check # 32443 (7/1/2015 – COPC Knightsbridge 6/19/2015)
618		Plan365 Check # 33231 (8/17/2015 – Family Physicians 8/13/2015)
619		Plan365 Check # 33732 (9/16/2015 – COPC Arlington Mill Run 9/11/2015)
620		Georges Fifth Third Bank Documentation
621		Summary Chart – Nicole Georges Bonuses from Insys
622		Federal Rule of Evidence 902(11) Business Records Affidavit for Plan365 TowneBank Records
623		Federal Rule of Evidence 902(11) Business Records Affidavit for Plan365 First Citizen's Records
624		Federal Rule of Evidence 902(11) Business Records Affidavit for Fifth Third Bank Records
700 SERIES – MIDWEST RECORDS		
701		CMS Medicare Provider Agreement – Henry & Midwest Spine
702		
703		Medicaid Provider Agreement – Henry
704		Medicaid Provider Agreement – Midwest Spine
705		Medical Licensure – Jimmy Henry
706		DEA Registration – Jimmy Henry
707		Physician's Assistant Licensure – Felicia Ciamacco
708		DEA Registration – Felicia Ciamacco
709		Midwest Spine and Pain LLC Business Documentation
710		Handwritten Subsys Documentation from Felicia Ciamacco
711		Blank Subsys PA & Referral Form from Felicia Ciamacco

712		Blank Subsys Patient Consent Form from Felicia Ciamacco
713		ER/LA Opioid Anagesics REMS Information Sheet from Felicia Ciamacco
714		Avella Specialty Pharmacy Flyer from Felicia Ciamacco
800 SERIES – INVESTIGATIVE DOCUMENTATION		
801		Open Payments Documentation – Jimmy Henry
802		Photographic Lineup – A.L.
803		Statement of Facts – Jimmy Henry Plea Agreement
804		Georges Verizon Subscriber Information

The United States reserves the right to supplement or amend its exhibit list.

Respectfully submitted,

/s/Christopher Jason

Christopher Jason
Trial Attorney
Fraud Section, Criminal Division
U.S. Department of Justice
303 Marconi Boulevard, # 200
Columbus, OH 43215
Telephone: (202) 262-6438
Christopher.jason@usdoj.gov

/s/Katherine Pridemore

Katherine Pridemore
Trial Attorney
Fraud Section, Criminal Division
U.S. Department of Justice
303 Marconi Boulevard, # 200
Columbus, OH 43215
Telephone: (202) 875-1551
Katherine.e.pridemore@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on September 1, 2021, I electronically filed the United States' Amended Exhibit List, using the CM/ECF system, which will send notification of such filing to counsel for the Defendant on September 1, 2021.

/s/Christopher Jason
Christopher Jason
Trial Attorney
Fraud Section, Criminal Division
U.S. Department of Justice
303 Marconi Boulevard, # 200
Columbus, OH 43215
Telephone: (202) 262-6438
Christopher.jason@usdoj.gov